each product and field office 355. A differential calculation unit 310 compares the actual inventory values from the data collection unit 325 and the model inventory values from the inventory model determination unit 305. Based on this comparison, the differential calculation unit 310 determines whether an overage or a shortage of inventory exists from the model for each product and field office/local distribution center 355. If a shortage in inventory exists, a demand signal is sent to the production/inventory management unit 320. In response to the demand signal, the production inventory management unit 320 determines whether the products must be produced or picked from consignment inventory. See the Brockman reference at column 2, lines 10-35 and Fig. 1.

Applicant's claimed system is directed to a dynamic supply chain system wherein a key aspect is determining what stores are in the system at any given time and what attributes, such as the distributors for a given store, are current for those stores then in the system. That is why the claims focus on collecting and comparing first and second identification information when any data is collected from a store, and then updating the store registration based on the comparison. Referring now to applicant's claim 1, a method is claimed for updating information in a supply chain management framework which includes a step (a) of "registering a plurality of stores of a supply chain utilizing a network, the registration including receiving first identification information". The Examiner admits that no such registration process is disclosed in Brockman. Additionally, claim 1 calls for the step of "collecting data from a plurality of stores of the supply chain utilizing the network, the data relating to the sale of goods by the stores and including second identification information more recent than the first identification information." In Brockman, there is a disclosure of collecting data from a logistics/transportation section 345 and the field office/local distribution centers 355 in the data collection unit 325. See column 2, lines 15-19 of Brockman. However, there is no disclosure or suggestion of the collection of data that includes "second identification information more recent than the first identification information."

Additionally, claim 1 calls for the step of "allowing access to the data utilizing a network based interface." The Examiner admits in his rejection that Brockman does not disclose using a network.

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Additionally, claim 1 calls for the step of "comparing the first identification information with the second identification information." Since no first or second identification information is disclosed, no such comparison step can be disclosed in Brockman. Finally, claim 1 calls for the step of "updating the registration of the stores based on the comparison. Since Brockman does not disclose a "registering" process that includes "receiving first identification information", and does not disclose receiving "second identification information more recent than the first identification information," and does not disclose "comparing the first identification information with the second identification information", there can be clearly no disclosure or suggestion of a step of "updating the registration of the stores based on the comparison." Accordingly, the rejection of claim 1 should be withdrawn.

Claims 2-6 depends upon claim 1 and should be allowable for the same reasons set forth for claim 1. Additionally, claim 3 includes the further limitation of updating a specific attribute in the identification information in the registration, i.e., the "updating" step includes "updating a distributor assigned to the stores based on the comparison." Additionally, claim 2 calls for "updating the first identification information to include the second identification information." Additionally, claim 6 calls for the network being the "Internet." None of these claimed features are disclosed or suggested by Brockman. Brockman simply does not disclose updating attribute information in the first identification information such as updating a distributor during the process of receiving data from a plurality of stores.
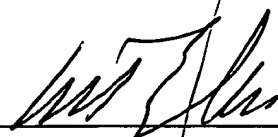
Claims 7-12 describe and claim the invention in a system context. Likewise, claims 13-18 claim the invention in a computer program product context. These claims are not disclosed or suggested by the Brockman reference for the reasons stated previously. Accordingly, withdrawal of the rejection of these claims is respectfully requested.

In view of the foregoing remarks, the application is considered to be in a condition for allowance. Early passage to issue of the application is respectfully requested.

Respectfully submitted,

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